

EXHIBIT 114

1 UNITED STATES DISTRICT COURT
2 FOR THE SOUTHERN DISTRICT OF NEW YORK
3
4 GOVERNMENT OF THE UNITED)
5 STATES VIRGIN ISLANDS)
6 Plaintiff,)
7 vs.) 1:22-cv-10904-JSR
8 JPMORGAN CHASE BANK, N.A.,)
9 Defendant/Third-)
10 Party Plaintiff.)
11)
12 JPMORGAN CHASE BANK, N.A.)
13)
14 Third-Party)
15 Plaintiff,)
16 vs.)
17)
18 JAMES EDWARD STALEY,)
19)
20 Third-Party)
21 Defendant.)
22
23

15 FRIDAY, APRIL 7, 2023

16 CONFIDENTIAL - ATTORNEYS' EYES ONLY

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18 Videotaped deposition of Mary
19 Casey, held at the offices of Boies Schiller
20 & Flexner, 100 SE 2nd Street, Suite 2800,
21 Miami, Florida, commencing at 9:23 a.m.
22 Eastern, on the above date, before Carrie A.
23 Campbell, Registered Diplomate Reporter,
24 Certified Realtime Reporter, Illinois,
25 California & Texas Certified Shorthand
 Reporter, Missouri, Kansas, Louisiana & New
 Jersey Certified Court Reporter.

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1 Epstein's accounts?

2 MR. BUTTS: Objection.

3 You may answer.

4 THE WITNESS: Escalate

5 concerns? No.

6 QUESTIONS BY MS. LIU:

7 Q. Escalate anything else?

8 A. Yes.

9 Q. What would that be?

10 A. I escalated concerns for
11 reputational risk. I also, in response to a
12 request from compliance -- well, escalated
13 concerns with respect to reputational risk, I
14 would say.

15 Q. And what does that mean?

16 A. I would escalate my concerns
17 for whether -- my concerns around the
18 reputation of the firm and who we were
19 working with at the time.

20 Q. Specifically what concerns did
21 you escalate for reputational risk with
22 respect to Jeffrey Epstein's accounts?

23 A. Post-2006, when there was media
24 reports with respect to his behavior, I would
25 share my concerns with respect to the media

1 bank accounts, including Jeffrey Epstein; is
2 that fair?

3 A. That is correct.

4 Q. And why would you have
5 forwarded this article to Jes Staley on the
6 same day?

7 A. To escalate to Jes.

8 Q. And why were you escalating to
9 Jes? What was his role?

10 A. Jes was one of the primary
11 people to work with Jeffrey's account.

12 Q. In addition to yourself?

13 A. Correct.

14 Q. And if you turn -- we have
15 pulled the article, and you'll see it's
16 attached.

17 And it says, "After long probe,
18 Palm Beach billionaire faces solicitation
19 charge," dated Wednesday, July 26, 2006.

20 Do you see that?

21 A. Yes.

22 Q. And does this refresh your
23 recollection that at the time in 2006, you
24 were receiving a number of news reports with
25 respect to charges that were going to be

1 THE WITNESS: I escalated a
2 concern.

3 QUESTIONS BY MS. LIU:

4 Q. And what was your concern?

5 A. My concern was the reputational
6 risk of the client.

7 Q. And that was based on seeing
8 these news reports, correct?

9 A. That is correct.

10 Q. And Mary Erdoes also saw these
11 news reports, correct?

12 She was on the same e-mail from
13 Philip Schlakman to you forwarding the news
14 report, correct?

15 MR. BUTTS: Objection to form.

16 You may answer.

17 THE WITNESS: She was on that
18 e-mail, yes.

19 QUESTIONS BY MS. LIU:

20 Q. Do you know if she was worried,
21 too?

22 A. I do not know.

23 Q. And you were uncertain after
24 seeing those news reports whether you wanted
25 to continue to cover Jeffrey Epstein,